

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CR. NO. 1:24-CR- 00096
:
v. : (Judge WILSON)
:
DURANTE KING-MCLEAN, :
PRASATH PARAMALINGAM, :
ARCHIT GROVER, and :
JALISA EDWARDS, :
Defendants :

FILED
HARRISBURG, PA

APR 10 2024

INDICTMENT

PER Irr
DEPUTY CLERK

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 933(a)(1), (a)(3) and (b)
(Conspiracy to Traffick in Firearms)

Beginning on or about April 2023, up to and including September 2, 2023, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

DURANTE KING-MCLEAN,
and
PRASATH PARAMALINGAM,

did knowingly conspire and agree with each other, and with persons known and unknown to the grand jury, to ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms,

including, but not limited to, the firearms identified in Count 2 of this Indictment, to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)).

OVERT ACTS

The following are overt acts, among others, in furtherance of this conspiracy. The factual allegations contained in counts 2 through 6 inclusive are also incorporated here as overt acts:

1. On April 23, 2023, **KING-MCLEAN** and **PRASATH PARAMALINGAM**, and others known and unknown to the grand jury, discussed arranging for **KING-MCLEAN**'s illegal entry into the United States to illegally secure and transport firearms back to Canada.

2. On April 24, 2023, **PRASATH PARAMALINGAM** discussed with **KING-MCLEAN** flight information and plans to meet with **KING-MCLEAN** in the United States in a "Threema" chat. Threema is a paid cross platform encrypted instant messaging application developed in Switzerland.

3. On May 22, 2023, in a Threema chat **PRASATH PARAMALINGAM** wrote that he is going to leave Portugal early to get cash for **KING-MCLEAN**.

4. On May 23, 2023, **PRASATH PARAMALINGAM** sent to **KING-MCLEAN** a photograph of large amounts of Canadian Currency wrapped together in multiple rubber bands. **PRASATH PARAMALINGAM** wrote: “Just picked up the change for you going...to exchange the change to USD”.

5. On May 24, 2023, **PRASATH PARAMALINGAM** and another person known to the Grand Jury flew from Toronto, Ontario, to New York City, New York, to deliver money to **KING-MCLEAN**.

6. On May 25, 2023, in a Threema chat between **KING-MCLEAN** and **PRASATH PARAMALINGAM**, going by “Stunner”, **PARSATH PARAMALINGAM** wrote that the “funds are here”.

7. On May 29, 2023, **PRASATH PARAMALINGAM** flew back to Toronto, Ontario, via Miami International Airport.

8. On June 17, 2023, utilizing Instagram, **KING-MCLEAN** and **PRASATH PARAMALINGAM**, using the moniker “sristar16”,

discussed the rental of an Airbnb for **KING-MCLEAN**. The Airbnb being discussed was located in Fort Lauderdale, FL.

9. While **KING-MCLEAN** stayed at the Airbnb he and **PRASATH PARAMALINGAM** and others known to the Grand Jury communicated routinely via social media regarding facilitating **KING-MCLEAN's** stay at the Airbnb.

10. On July 13, 2023, utilizing Instagram, **PRASATH PARAMALINGAM** wrote to **KING-MCLEAN** and stated that he has “change” for him and that a person known to the Grand Jury would bring the money.

11. On August 8, 2023, utilizing Threema, **PRASATH PARAMALINGAM** and **KING-MCLEAN** discussed the purchase of several firearms for “3500”. **PRASATH PARAMALINGAM** then communicated: “Get it...Good to go gtg”.

12. Throughout the month of August 2023, **KING-MCLEAN** took multiple photographs of firearms and large amounts of US currency utilizing his cellphone.

13. On or about August 28, 2023, in a text message conversation with **JALISA EDWARDS** a/k/a “lisa”, **KING-MCLEAN** talked about

acquiring “45 sticks” that month. **JALISA EDWARDS** expressed concern to **KING-MCLEAN** before he left Florida about him “getting pulled.”

14. On August 28, 2023, **KING-MCLEAN** left Florida in a rental vehicle and traveled north. **KING-MCLEAN** stopped for a few days in Atlanta, Georgia where he met with a person known to the Grand Jury who rented a U-Haul storage facility on August 15, 2023, located in Atlanta, Georgia.

15. On August 30 and August 31, 2023, **KING-MCLEAN** visited the U-Haul facility in Atlanta, Georgia. Surveillance video footage from the storage facility shows **KING-MCLEAN** with a backpack in his left hand. The backpack was recovered from the trunk of **KING-MCLEAN**’s vehicle on September 2, 2023, and contained over 30 firearms.

16. On September 2, 2023, **KING-MCLEAN** was stopped in Franklin County by the Pennsylvania State Police for a motor vehicle violation. During the course of the stop, **KING-MCLEAN** fled on foot and was captured by police at the scene. During the stop, PSP seized firearms from the trunk of the rental vehicle. Of the 65 firearms that

were recovered, 2 were fully automatic, 11 were stolen and 1 had an obliterated serial number.

All in violation of Title 18, United States Code, Sections 933(a)(1), (a)(3), and (b).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 2

18 U.S.C. § 922(g)(5)
(Illegal Alien in Possession of a Firearm)

On or about September 2, 2023, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

DURANTE KING-MCLEAN,

knowing that he was an alien illegally and unlawfully in the United States, did knowingly possess the following firearms, having been shipped and transported in interstate commerce:

- 1) Black Glock, Model 19, 9mm semi-automatic pistol, serial number ABPL922;
- 2) Black/Silver Slide Glock, Model 48, 9mm semi-automatic pistol, serial number BLRV087;
- 3) Silver Smith & Wesson, Model SD-9, 9mm semi-automatic pistol, serial number FBX3417;
- 4) Black Glock, Model 26, 9mm semi-automatic pistol, serial number BPS766;

- 5) Black Glock, Model 44, .22 caliber semi-automatic pistol, serial number ADUH599;
- 6) Tan Glock, Model 19X, 9mm semi-automatic pistol, serial number BXZA621;
- 7) Black CZ, Model 75B, 9mm semi-automatic pistol, serial number B502440 (stolen);
- 8) Black Glock, Model 17, 9mm semi-automatic pistol, serial number BRED328;
- 9) Black Walter, Model PPX, 9mm semi-automatic pistol, serial number FBB3984;
- 10) Black Glock, Model 29, 10mm semi-automatic pistol, serial number BMDB760;
- 11) Black Glock, Model 17, 9mm semi-automatic pistol, serial number BNHZ466;
- 12) Black/Tan Grip Bersa, Model BP9CC, 9mm semi-automatic pistol, serial number K84936;
- 13) Black Glock, Model 17, 9mm semi-automatic pistol, serial number BEB732;
- 14) Black Glock, Model 22, .40 caliber full-automatic pistol, serial number IM3288PD;
- 15) White Glock, Model 48, 9mm semi-automatic pistol, serial number BXXMX185 (stolen);
- 16) Black Glock, Model 19, 9mm semi-automatic pistol, serial number HRG129;
- 17) Black Glock, Model 22, .40 caliber semi-automatic pistol, serial number CDT387;

- 18) Black Glock, Model 26, 9mm semi-automatic pistol, serial number AGGB118;
- 19) Black Glock, Model 43X, 9mm semi-automatic pistol, serial number BMYF253;
- 20) Black Glock, Model 22, .40 caliber semi-automatic pistol, serial number KHX808;
- 21) Black Glock, Model 22, .40 caliber semi-automatic pistol, serial number BEP981;
- 22) Black Smith & Wesson, Model MP SHIELD EZ, 9mm semi-automatic pistol, serial number RHN3480 (stolen);
- 23) Black Glock, Model 17, 9mm semi-automatic pistol, serial number BUMU902;
- 24) Black Glock, Model 23, .40 caliber semi-automatic pistol, serial number PZT906;
- 25) Black Glock, Model 42, .380 caliber semi-automatic pistol, serial number ADV569 (stolen);
- 26) Black Glock, Model 27, .40 caliber semi-automatic pistol, serial number BXMU928;
- 27) Black Glock, Model 27, .40 Caliber semi-automatic pistol, serial number HHL731;
- 28) Black Glock, Model 19, 9mm semi-automatic pistol, serial number VRP332;
- 29) Black/Wood Grip CENTURY ARMS, Model MICRO DRACO, 7.62x39 semi-automatic pistol, serial number ROA22PMD38608;

- 30) Black Glock, Model 23, .40 caliber semi-automatic pistol, serial number BWTN708;
- 31) Black/Tan Grip Glock, Model 19, 9mm semi-automatic pistol, serial number BALV446;
- 32) Black/Gold Barrel Glock, Model 19, 9mm semi-automatic pistol, serial number VKX458;
- 33) Black Glock, Model 42, .380 caliber semi-automatic pistol, serial number AAYV595;
- 34) Black Glock, Model 43, 9mm semi-automatic pistol, serial number ABUC716;
- 35) Black Glock, Model 43X, 9mm semi-automatic pistol, serial number BXSX066;
- 36) Black Glock, Model 42, .380 caliber semi-automatic pistol, serial number ACGB895;
- 37) Black/Green Slide Glock, Model 21, .45 caliber semi-automatic pistol, serial number 21 LLK666;
- 38) Black Glock, Model 21, .45 caliber semi-automatic pistol, serial number AFWY423;
- 39) Black Glock, Model 19, 9mm semi-automatic pistol, serial number VXZ546;
- 40) Black Glock, Model 21, .45 caliber semi-automatic pistol, serial number TUF309;
- 41) Black Glock, Model 30, .45 caliber semi-automatic pistol, serial number BRRU330;
- 42) Black Glock, Model 17, 9mm semi-automatic pistol, serial number BMCW863;

- 43) Black Smith & Wesson, Model MP9 Shield Plus, 9mm semi-automatic pistol, serial number JMT5892 (stolen);
- 44) Silver/Black Grip Walther, Model PPK, .380 caliber semi-automatic pistol, serial number AA091465;
- 45) Black Glock, Model 17, 9mm semi-automatic pistol, serial number BNXX605 (FULL AUTO);
- 46) Black Polymer 80;
- 47) Black Sig Sauer, Model P365, 9mm semi-automatic pistol, serial number 66F050784 (stolen);
- 48) Black/Gray Grip Polymer 80;
- 49) Tan FN, Model 509, 9mm semi-automatic pistol, serial number GKS0112046;
- 50) Black Walther, Model PPS, 9mm semi-automatic pistol, serial number AY3517 (stolen);
- 51) Black/Silver Slide Ruger, Model LCP, .380 caliber semi-automatic pistol, serial number 372453667;
- 52) Black Smith & Wesson, Model MP 9 SHIELD, 9mm semi-automatic pistol, serial number HUM0637 (stolen);
- 53) Black Sig Sauer, Model P320, 9mm semi-automatic pistol, serial number 58J245158 (stolen);
- 54) Black Smith & Wesson, Model MP 45 SHIELD, OBLITERATED S/N;
- 55) Black Polymer 80;

- 56) Black Smith & Wesson, Model MP 9 SHIELD, 9mm semi-automatic pistol, serial number JMY4588;
- 57) Black Ruger, Model LCP, .380 caliber semi-automatic pistol, serial number 380025596 (stolen);
- 58) Black Smith & Wesson, Model MP 9, 9mm semi-automatic pistol, serial number NCL3397 (stolen);
- 59) Black polymer 80;
- 60) Black Sig Sauer, Model P238, .380 caliber semi-automatic pistol, serial number 27B260808;
- 61) Gray/Black Slide;
- 62) Green Palmetto State Armory, Model Dagger Compact, 9mm semi-automatic pistol, serial number FG085941;
- 63) Black Sig Sauer, Model P365, 9mm semi-automatic pistol, serial number 66B875617;
- 64) Black Glock, Model 45, 9mm semi-automatic pistol, serial number BWDN843; and
- 65) Black Glock, Model 43, 9mm semi-automatic pistol, serial number AFNN379.

All in violation of Title 18, United States Code, Sections 922(g)(5) and 924(a)(8).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 3

18 U.S.C. § 554 and 2

(Attempt to Unlawfully Export Firearms)

Beginning on or about April 2023, up to and including September 2, 2023, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**DURANTE KING-MCLEAN,
and
PRASATH PARAMALINGAM,**

did fraudulently and knowingly attempt to export and send from the United States to Canada, merchandise, articles, and objects, that is, the firearms identified in Count 2 of this Indictment, contrary to the laws and regulations of the United States, to wit: Title 50, United States Code, Section 4819(a)(2) and (b) and Title 15, Code of Federal Regulations Section 730, et. seq., and did receive, conceal, buy, sell, and in any manner facilitated the transportation, concealment, and sale of said merchandise, articles, and objects, prior to exportation, knowing the same to be intended for exportation contrary to said laws and regulations of the United States.

All in violation of Title 18, United States Code, Sections 554 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 4

18 U.S.C. § 922(o)

(Illegal Possession of a Machinegun)

On or about September 2, 2023, in Franklin County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

DURANTE KING-MCLEAN,

did knowingly possess machineguns, that is, a fully automatic Glock 22
Gen 4 40 caliber, serial number IM3288PD, and a fully automatic Glock
17 9mm, serial number BNXXK605.

All in violation of Title 18, United States Code, Sections 922(o) and
924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 5

18 U.S.C. § 922(k)

(Possession of Firearm With Obliterated Serial Number)

On or about September 2, 2023, in Franklin County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

DURANTE KING-MCLEAN,

knowingly possessed in interstate commerce a firearm, that is a Smith
and Wesson M&P 45 Shield handgun, that had been shipped and

transported in interstate commerce, from which the manufacturer's serial number had been removed, altered, and obliterated.

All in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

THE GRAND JURY FURTHER CHARGES:

COUNT 6

18 U.S.C. § 922(j)
(Possession of a Stolen Firearm)

On or about September 2, 2023, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

DURANTE KING-MCLEAN,

knowingly possessed a stolen firearm, that is,

MAKE MODEL CALIBER SERIAL NUMBER

CZ	CZ75	9mm	B502440
Glock	48	9mm	BXMX185
Glock	42	380	ADVC569
Smith & Wesson	M & P 9 Shield EZ	9mm	RHN3480
Smith & Wesson	M&P 9 Shield Plus	9mm	JMT5892
Sig Sauer	P365	9mm	66F050784
Walther	PPS	9mm	AY3517
Smith & Wesson	M & P 9 Shield	9mm	HUM0637
Sig Sauer	P320	9mm	58J245158
Ruger	LCP	380	380025596
Smith & Wesson	M & P 9	9mm	NCL3397

which had been shipped and transported in interstate commerce, knowing, and having reasonable cause to believe the firearm was stolen.

All in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 7
18 U.S.C. § 3
(Accessory After the Fact)

Beginning on or about September 2, 2023, up and to the present, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendant,

JALISA EDWARDS,

knowing that an offense against the United States had been committed, to wit, those offenses described in Counts One through Six of this Indictment, did receive, relieve, comfort, and assist the offender, **DURANTE KING-MCLEAN**, in order to hinder and prevent the offender's apprehension, trial, and punishment, by among other things, **JALISA EDWARDS** engaging in numerous telephone conversations with and between **KING-MCLEAN**, **ARCHIT GROVER**, and others known to the grand jury, alerting others to **KING-MCLEAN**'s arrest, the nature of

the investigation being federal, removal of evidence from the Airbnb in Florida, and arranging with **ARCHIT GROVER** for a \$1,000 payment to the rental car agency to secure an after-the-fact rental agreement for the vehicle **KING-MCLEAN** was using to transport firearms to Canada.

All in violation of 18 U.S.C. § 3.

THE GRAND JURY FURTHER CHARGES:

COUNT 8
18 U.S.C. § 3
(Accessory After the Fact)

Beginning on or about September 2, 2023, up and to the present, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

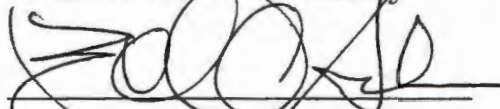
ARCHIT GROVER,

knowing that an offense against the United States had been committed, to wit, those offenses described in Counts One through Six of this Indictment, did receive, relieve, comfort, and assist the offender, **DURANTE KING-MCLEAN**, in order to hinder and prevent the offender's apprehension, trial, and punishment, by among other things, **ARCHIT GROVER** engaging in numerous telephone conversations with and between **KING-MCLEAN**, **JALISA EDWARDS**, and others, known

to the grand jury concerning alerting others to **KING-MCLEAN's** arrest, the nature of the investigation being federal, removal of possible evidence from the Airbnb in Florida, and sending at **JALISA EDWARD's** request a \$1,000 payment to the rental car agency to secure an after-the-fact rental agreement for the vehicle **KING-MCLEAN** was using to transport firearms to Canada.

All in violation of 18 U.S.C. § 3.

GERARD M. KARAM
United States Attorney


WILLIAM A. BEHE
Assistant United States Attorney

A TRUE BILL


FOREPERSON

4/10/2024
Date